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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY AD
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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

WHOLE WOMAN'S HEALTH, et al.,)
)
Plaintiffs,)
)
v.)
)
JOHN HELLERSTEDT, M.D.,)
)
Defendant.)

CIVIL ACTION

CASE NO. 1:16-cv-01300-SS

STIPULATION

1. The parties to this action, through counsel, hereby agree and stipulate that the name, address, and any other identifying information regarding the "one facility in the entire state willing and able to provide cremation services for embryonic and fetal tissue from abortion clinics at a cost that is not an order of magnitude larger than their current special waste disposal costs," mentioned in Plaintiffs' Complaint at ¶ 71 (ECF No. 1), is "For Counsel Only" under the terms of the proposed Confidentiality and Protective Order today submitted in this case.

2. Upon request of the Court, Plaintiffs' counsel shall provide this information to the Court under seal.

3. Until such time, if any, as the Court grants the Confidentiality and Protective Order and so-orders the present Stipulation, the parties and their counsel shall abide by the terms of this Stipulation to the same extent as they would be bound to do had the Court granted the Confidentiality and Protective Order and entered the present Stipulation.

SO ORDERED this 29th day of December, 2016

Sam Sparks
Sam Sparks
United States District Judge

✓

Dated: December 28, 2016

Respectfully submitted,

/s/ Patrick J. O'Connell

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